

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

NETWORK SYSTEM TECHNOLOGIES, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:22-cv-1331
	)	
QUALCOMM INCORPORATED;	)	<b>JURY TRIAL DEMANDED</b>
QUALCOMM TECHNOLOGIES, INC.;	)	
ARTERIS, INC.,	)	
	)	
Defendants.	)	
	)	

**QUALCOMM INCORPORATED AND QUALCOMM TECHNOLOGIES, INC.’S  
ANSWER TO COMPLAINT AND DEFENSES**

Defendants Qualcomm Incorporated and Qualcomm Technologies, Inc., (collectively, “Qualcomm” or “Defendants”), by their undersigned attorneys, hereby submit this Answer to the Complaint of Plaintiff Network System Technologies, LLC (“NST” or “Plaintiff”).<sup>1</sup> Qualcomm further asserts its defenses.

Qualcomm denies that it infringes or has infringed any valid and enforceable patent rights at issue in this action. Qualcomm further denies any liability to Plaintiff, or that Plaintiff has suffered any legally cognizable damage for which Qualcomm is responsible. The responses below reflect the current status of Qualcomm’s knowledge and belief regarding the subject matter of the allegations to which they respond. Qualcomm reserves the right to supplement, modify, and/or amend its responses, defenses, and add counterclaims through its discovery responses, expert

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<sup>1</sup> Qualcomm has filed a Partial Motion to Dismiss Plaintiff Network System Technologies, LLC’s Complaint. The filing of this Answer does not moot the relief sought in that motion.

disclosures, and presentation of evidence based on any additional facts or developments that become available or that arise after the filing of this Answer.

Except as expressly admitted below, Qualcomm denies each and every allegation averred in the Complaint, including without limitation the headings, sub-headings, and diagrams contained in the Complaint, including any attachments and/or exhibits to the Complaint. Any admissions herein are for the purposes of this matter only. Any factual allegation admitted below is admitted only as to the specific admitted facts, and not as to any purported conclusions, characterizations, implications, or speculations that might follow from the admitted facts. Qualcomm responds to the numbered paragraphs of the Complaint as follows. The paragraph numbering in these responses corresponds to the numbered paragraphs in the Complaint. Subject to the foregoing, Qualcomm states as follows:

### **NATURE OF THE ACTION**

1. Qualcomm admits that NST has filed a civil action purporting to assert claims of infringement of U.S. Patent Nos. 7,366,818 (the “’818 patent”); 7,373,449 (the “’449 patent”); 7,594,052 (the “’052 patent”); 7,769,893 (the “’9893 patent”); 8,072,893 (the “’2893 patent”); and 8,086,800 (the “’800 patent”) (collectively, “the Asserted Patents”). Qualcomm denies that NST’s claims have merit. Qualcomm denies the remaining allegations in this paragraph.

### **THE PARTIES**

2. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 2 of the Complaint, and therefore denies them.

3. Qualcomm admits that Qualcomm Incorporated is a corporation organized and existing under the laws of the State of Delaware and has a principal place of business at 5775

Morehouse Dr., San Diego, California 92121. Qualcomm admits that Qualcomm Incorporated has an office located at 9600 N. Mopac, Suite 900, Stonebridge Plaza II, Austin, Texas 78759. Qualcomm admits that Prentice Hall Corp System, located at 211 E. 7th Street, Suite 620, Austin, Texas 78701, is a registered agent for service for certain purposes. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 3.

4. Qualcomm admits that Qualcomm Technologies, Inc. is a wholly-owned subsidiary of Qualcomm Incorporated, and is a corporation organized and existing under the laws of the State of Delaware, having a principal place of business at 5775 Morehouse Dr., San Diego, California 92121. Qualcomm admits that Qualcomm Technologies, Inc. has an office located at 9600 N. Mopac, Suite 900, Stonebridge Plaza II, Austin, Texas 78759. Qualcomm admits that Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, located at 211 E. 7th Street, Suite 620, Austin, Texas 78701, is a registered agent for service for certain purposes. Qualcomm admits that Qualcomm Technologies, Inc., together with its subsidiaries, operates substantially all of Qualcomm's engineering, research, and development functions. Qualcomm denies any remaining allegations and characterizations in Paragraph 4 of the Complaint.

5. Paragraph 5 does not raise an allegation to which a response is required.

6. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 6 of the Complaint, and therefore denies them.

7. Paragraph 7 does not raise an allegation to which a response is required.

8. Qualcomm denies the allegations and characterizations contained in Paragraph 8 of the Complaint. Qualcomm further denies that it infringes or has infringed the Asserted Patents.

### **JURISDICTION AND VENUE**

9. Qualcomm admits that this Court has subject matter jurisdiction for Plaintiff's infringement claim under 28 U.S.C. § 1331 and 1338(a) only. Otherwise, Qualcomm denies the remaining allegations and characterizations contained in Paragraph 9 of the Complaint.

10. Paragraph 10 alleges legal conclusions to which no response is required. To the extent a response is required, Qualcomm does not contest that this Court has personal jurisdiction over Qualcomm Incorporated and Qualcomm Technologies, Inc. for purposes of this case. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 10.

11. Paragraph 11 alleges legal conclusions to which no response is required. To the extent a response is required, Qualcomm does not contest that this Court has personal jurisdiction over Qualcomm Incorporated and Qualcomm Technologies, Inc. for purposes of this case. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris, Inc. ("Arteris") contained in Paragraph 11 of the Complaint, and therefore denies the remaining allegations and characterizations.

12. Qualcomm denies the allegations and characterizations contained in Paragraph 12 of the Complaint. Qualcomm further denies that it infringes or has infringed the Asserted Patents.

13. Paragraph 13 alleges legal conclusions to which no response is required. To the extent a response is required, Qualcomm does not contest that this Court has personal jurisdiction over Qualcomm Incorporated and Qualcomm Technologies, Inc. for purposes of this case. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 13 of the Complaint, and therefore denies the remaining allegations and characterizations.

14. Paragraph 14 alleges legal conclusions regarding venue to which no response is required. To the extent a response is required, Qualcomm does not contest that venue is proper in this District for purposes of this case. Qualcomm denies that in the interests of justice, this venue is convenient for the parties or the witnesses. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 14 of the Complaint, and therefore denies the remaining allegations and characterizations. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 14.

15. Qualcomm does not contest that venue is proper in this District for purposes of this case. Qualcomm admits that it has admitted that it maintained an office in this Judicial District. The remainder of Paragraph 15 alleges legal conclusions to which no response is required. Qualcomm denies that in the interests of justice, this venue is convenient for the parties or the witnesses. To the extent a response is required, Qualcomm admits that some employees' work in Austin, Texas relates to SoCs. Qualcomm denies the remaining allegations and characterizations in Paragraph 15 of the Complaint. Qualcomm further denies that it infringes or has infringed the Asserted Patents.

16. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 16 of the Complaint, and therefore denies them.

### **JOINDER**

17. Paragraph 17 alleges legal conclusions to which no response is required. To the extent a response is required, Qualcomm denies the allegations and characterizations in Paragraph 17 of the Complaint. Qualcomm further denies that it infringes or has infringed the Asserted Patents.

18. Paragraph 18 alleges legal conclusions to which no response is required. To the extent a response is required, Qualcomm denies the allegations and characterizations in Paragraph 18 of the Complaint. Qualcomm further denies that it infringes or has infringed the Asserted Patents.

19. Qualcomm admits that there is a license agreement between Cambridge Silicon Radio Limited and Arteris, and that Qualcomm acquired Cambridge Silicon Radio Limited. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 19 of the Complaint.

20. Qualcomm admits that it purchased certain assets from Arteris in 2013, and further admits that some Qualcomm employees were previously employed by Arteris in 2013. As the phrase “certain Arteris SoC technology, and/or derivatives thereof” is vague and ambiguous, Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and characterizations contained in Paragraph 20 of the Complaint, and therefore denies the same.

### **THE ASSERTED PATENTS**

21. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 21 of the Complaint, and therefore denies them.

**U.S. Patent No. 7,366,818**

22. Qualcomm acknowledges that Exhibit 1 to the Complaint purports to be a copy of U.S. Patent No. 7,366,818 (the “’818 patent”). Qualcomm admits that the first page of Exhibit 1 lists the title, issue date, and inventors as identified in Paragraph 22 of the Complaint. Qualcomm denies that the ’818 patent should have been issued. Qualcomm is without knowledge or information sufficient to admit or deny the remaining allegations of Paragraph 22 and therefore denies the same.

23. Qualcomm admits that the ’818 patent has one independent claim and six dependent claims. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 23.

24. Paragraph 24 alleges legal conclusions to which no response is required. To the extent a response is required, Qualcomm denies the allegations and characterizations in Paragraph 24 of the Complaint.

25. Qualcomm admits that Paragraph 25 reproduces the language of claim 1 of the ’818 patent. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 25 of the Complaint.

26. Qualcomm denies the allegations and characterizations contained in Paragraph 26 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 26 of the Complaint, and therefore denies the same.

27. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in the first sentence of Paragraph 27 of the Complaint, and therefore denies them. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 27 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 27 of the Complaint, and therefore denies the same.

28. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 28 of the Complaint, and therefore denies them.

29. Qualcomm admits, based on a current review of publicly-available information, it appears that U.S. Publication No. 2006/0041888 was cited, along with a number of other references, during the prosecution of U.S. Patent Application No. 11/518,384 that was assigned to Defendant Arteris or an affiliate of Arteris, but U.S. Publication No. 2006/0041888 was not the basis for any rejection during prosecution of that Arteris application, Qualcomm was not involved in the prosecution of that Arteris application, and that Arteris application was abandoned in 2010. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and characterizations contained in Paragraph 29 of the Complaint, and therefore denies them.

30. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) FR2900017B1 is entitled “EXTERNAL CHIP FUNCTIONAL BLOCK INTERCONNECTION SYSTEM PROVIDED WITH A SINGLE COMMUNICATION PARAMETRABLE PROTOCOL”; (2) FR2900017B1 lists an issue date



of October 31, 2008; (3) FR2900017B1 was assigned to Defendant Arteris or an affiliate of Arteris. Because Qualcomm was not involved with the prosecution of FR2900017B1, Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and characterizations contained in Paragraph 30 of the Complaint, and therefore denies them.

31. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) FR2904445B1 is entitled “SYSTEM FOR MANAGING MESSAGES TRANSMITTED IN A CHIP INTERCONNECTION NETWORK”; (2) FR2904445B1 lists an issue date of October 10, 2008; (3) FR2904445B1 was assigned to Defendant Arteris or an affiliate of Arteris. Because Qualcomm was not involved with the prosecution of FR2904445B1, Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and characterizations contained in Paragraph 31 of the Complaint, and therefore denies them.

32. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) U.S. Publication No. 2006/0041888 was cited, along with a number of other references, during the prosecution of U.S. Patent Application No. 11/518,384, entitled “SYSTEM FOR MANAGING MESSAGES TRANSMITTED IN AN ON-CHIP INTERCONNECT NETWORK”; (2) U.S. Patent Application No. 11/518,384 lists a filing date of September 8, 2006; (3) U.S. Patent Application No. 11/518,384 was assigned to Defendant Arteris or an affiliate of Arteris; and (4) the Examiner during the prosecution of U.S. Patent Application No. 11/518,384 stated that “The prior art made of record and not relied upon is considered pertinent to applicant’s disclosure because they relate network on a chip architecture.” Office Action dated Nov. 23, 2009, File History of U.S. Pat. App. No. 11/518,384.

Qualcomm denies the remaining allegations and characterizations contained in Paragraph 32 of the Complaint.

33. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 33 of the Complaint, and therefore denies them.

34. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 34 of the Complaint, and therefore denies them.

35. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 35 of the Complaint, and therefore denies them.

36. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 36 of the Complaint, and therefore denies them.

37. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 37 of the Complaint, and therefore denies them.

38. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 38 of the Complaint, and therefore denies them.

39. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 39 of the Complaint, and therefore denies them.

40. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 40 of the Complaint, and therefore denies them.

41. Qualcomm admits, based on a current review of publicly-available information, it appears that U.S. Publication No. 2006/0041888 was cited, along with a number of other references, during the prosecution of U.S. Patent Application No. 11/518,384 that was assigned to Defendant Arteris or an affiliate of Arteris, but U.S. Publication No. 2006/0041888 was not the basis for any rejection during prosecution of that Arteris application, Qualcomm was not involved in the prosecution of that Arteris application, and that Arteris application was abandoned in 2010. Qualcomm admits that U.S. Patent Application No. 11/518,384 was assigned to Qualcomm in 2013, more than three years after that application was abandoned. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 41 of the Complaint.

42. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) U.S. Publication No. 2006/0041888 was cited, along with a number of other references, during the prosecution of U.S. Patent Application No. 11/518,384, entitled “SYSTEM FOR MANAGING MESSAGES TRANSMITTED IN AN ON-CHIP INTERCONNECT NETWORK”; (2) U.S. Patent Application No. 11/518,384 lists a filing date of September 8, 2006; (3) U.S. Patent Application No. 11/518,384 was assigned to Qualcomm in 2013, more than three years after the application was abandoned; and (4) the Examiner during the prosecution of U.S. Patent Application No. 11/518,384 stated that “The prior art made of record and not relied upon is considered pertinent to applicant’s disclosure because they relate network on a chip architecture.” Office Action dated Nov. 23, 2009, File History of U.S. Pat.

App. No. 11/518,384. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 42 of the Complaint.

43. Qualcomm admits that it has sought to obtain valid and enforceable patents. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 43 of the Complaint.

44. Qualcomm denies the allegations and characterizations contained in Paragraph 44 of the Complaint.

45. As Paragraph 45 is vague and ambiguous (including without limitation the phrase “develop its products and product roadmaps . . . in ways that would not infringe”), Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 45 of the Complaint, and therefore denies the same.

46. Qualcomm denies the allegations and characterizations contained in Paragraph 46 of the Complaint.

47. Qualcomm denies the allegations and characterizations contained in Paragraph 47 of the Complaint.

48. Qualcomm admits that some of its employees have expertise and technical competence relative to SoC interconnects and NoCs. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of any remaining allegations and characterizations contained in Paragraph 48 of the Complaint and therefore denies them.

49. Qualcomm denies the allegations and characterizations contained in Paragraph 49 of the Complaint.

**U.S. Patent No. 7,373,449**

50. Qualcomm acknowledges that Exhibit 2 to the Complaint purports to be a copy of U.S. Patent No. 7,373,449 (the “’449 patent”). Qualcomm admits that the first page of Exhibit 2 lists the title, issue date, and inventors as identified in Paragraph 50 of the Complaint. Qualcomm denies that the ’449 patent should have been issued. Qualcomm is without knowledge or information sufficient to admit or deny the remaining allegations of Paragraph 50 and therefore denies the same.

51. Qualcomm admits that the ’449 patent has two independent claims and sixteen dependent claims. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 51.

52. Paragraph 52 alleges legal conclusions to which no response is required. To the extent a response is required, Qualcomm denies the allegations and characterizations in Paragraph 52 of the Complaint.

53. Qualcomm admits that Paragraph 53 reproduces the language of claim 10 of the ’449 patent. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 53 of the Complaint.

54. Qualcomm denies the allegations and characterizations contained in Paragraph 54 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 54 of the Complaint, and therefore denies the same.

55. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in the first sentence of Paragraph 55 of the Complaint, and therefore denies them. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 55 of the Complaint. Qualcomm is

currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 55 of the Complaint, and therefore denies the same.

56. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 56 of the Complaint, and therefore denies them.

57. Qualcomm admits that, based on a current review of publicly-available information, it appears that the '449 patent or the application thereof was cited, along with a number of other references, during prosecution of at least one patent application that was assigned to Defendant Arteris or an affiliate of Arteris, but Qualcomm was not involved in the prosecution on the merits of any such Arteris application(s). Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and characterizations contained in Paragraph 57 of the Complaint, and therefore denies them.

58. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) FR2900017B1 is entitled "EXTERNAL CHIP FUNCTIONAL BLOCK INTERCONNECTION SYSTEM PROVIDED WITH A SINGLE COMMUNICATION PARAMETRABLE PROTOCOL"; (2) FR2900017B1 lists an issue date of October 31, 2008; (3) FR2900017B1 was assigned to Defendant Arteris or an affiliate of Arteris. Because Qualcomm was not involved with the prosecution of FR2900017B1, Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and characterizations contained in Paragraph 58 of the Complaint, and therefore denies them.

59. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) FR2904445B1 is entitled “SYSTEM FOR MANAGING MESSAGES TRANSMITTED IN A CHIP INTERCONNECTION NETWORK”; (2) FR2904445B1 lists an issue date of October 10, 2008; (3) FR2904445B1 was assigned to Defendant Arteris or an affiliate of Arteris. Because Qualcomm was not involved with the prosecution of FR2904445B1, Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and characterizations contained in Paragraph 59 of the Complaint, and therefore denies them.

60. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) U.S. Publication No. 2006/0041889 was cited, along with a number of other references, during the prosecution of U.S. Patent No. 8,645,557, entitled “SYSTEM OF INTERCONNECTIONS FOR EXTERNAL FUNCTIONAL BLOCKS ON A CHIP PROVIDED WITH A SINGLE CONFIGURABLE COMMUNICATION PROTOCOL”; (2) U.S. Patent No. 8,645,557 lists a filing date of July 6, 2006 and an issue date of February 4, 2014; (3) U.S. Patent No. 8,645,557 was assigned to Defendant Arteris or an affiliate of Arteris; and (4) U.S. Publication No. 2006/0041889 was cited in Office Actions during the prosecution of U.S. Patent No. 8,645,557. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and characterizations contained in Paragraph 60 of the Complaint, and therefore denies them.

61. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) the ’449 patent was cited, along with a number of other references, during the prosecution of U.S. Patent Application No. 11/518,384, entitled “SYSTEM FOR MANAGING MESSAGES TRANSMITTED IN AN ON-CHIP

INTERCONNECT NETWORK”; (2) U.S. Patent Application No. 11/518,384 lists a filing date of September 8, 2006; (3) U.S. Patent Application No. 11/518,384 was assigned to Defendant Arteris or an affiliate of Arteris; and (4) U.S. Patent Application No. 11/518,384 was abandoned in 2010. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and characterizations contained in Paragraph 61 of the Complaint, and therefore denies them.

62. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 62 of the Complaint, and therefore denies them.

63. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 63 of the Complaint, and therefore denies them.

64. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 64 of the Complaint, and therefore denies them.

65. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 65 of the Complaint, and therefore denies them.

66. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 66 of the Complaint, and therefore denies them.



67. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 67 of the Complaint, and therefore denies them.

68. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 68 of the Complaint, and therefore denies them.

69. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 69 of the Complaint, and therefore denies them.

70. Qualcomm admits that, based on a current review of publicly-available information, it appears that the '449 patent or the application thereof was cited, along with a number of other references, during prosecution of at least one patent application that was assigned to Defendant Arteris or an affiliate of Arteris, but Qualcomm was not involved in the prosecution on the merits of the Arteris application(s). Qualcomm admits that U.S. Patent Application No. 11/518,384 was later assigned to Qualcomm in 2013, more than three years after the application was abandoned. Qualcomm admits that U.S. Patent No. 8,645,557 was later assigned to Qualcomm in 2013 after the prosecution on the merits was closed. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 70 of the Complaint.

71. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) the U.S. Publication No. 2006/0041889 was cited, along with a number of other references, during the prosecution of U.S. Patent No. 8,645,557, entitled "SYSTEM OF INTERCONNECTIONS FOR EXTERNAL FUNCTIONAL BLOCKS ON A CHIP PROVIDED WITH A SINGLE CONFIGURABLE COMMUNICATION PROTOCOL";

(2) U.S. Patent No. 8,645,557 lists a filing date of July 6, 2006 and an issue date of February 4, 2014; (3) U.S. Patent No. 8,645,557 was later assigned to Qualcomm Technologies, Inc. after the prosecution on the merits was closed; and (4) U.S. Publication No. 2006/0041889 was cited in Office Actions during the prosecution of U.S. Patent No. 8,645,557. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 71 of the Complaint.

72. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) the '449 patent was cited, along with a number of other references, during the prosecution of U.S. Patent Application No. 11/518,384, entitled "SYSTEM FOR MANAGING MESSAGES TRANSMITTED IN AN ON-CHIP INTERCONNECT NETWORK"; (2) U.S. Patent Application No. 11/518,384 lists a filing date of September 8, 2006; and (3) U.S. Patent Application No. 11/518,384 was later assigned to Qualcomm in 2013, more than three years after the application was abandoned. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 72 of the Complaint.

73. Qualcomm admits that it has sought to obtain valid and enforceable patents. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 73 of the Complaint.

74. Qualcomm denies the allegations and characterizations contained in Paragraph 74 of the Complaint.

75. Qualcomm restates, re-alleges, and incorporates by reference as though fully set forth herein its answer to Paragraph 45, as Paragraph 75 is duplicative of Paragraph 45.

76. Qualcomm denies the allegations and characterizations contained in Paragraph 76 of the Complaint.

77. Qualcomm denies the allegations and characterizations contained in Paragraph 77 of the Complaint.

78. Qualcomm admits that some of its employees have expertise and technical competence relative to SoC interconnects and NoCs. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of any remaining allegations and characterizations contained in Paragraph 78 of the Complaint and therefore denies them.

79. Qualcomm denies the allegations and characterizations contained in Paragraph 79 of the Complaint.

**U.S. Patent No. 7,594,052**

80. Qualcomm acknowledges that Exhibit 3 to the Complaint purports to be a copy of U.S. Patent No. 7,594,052 (the “’052 patent”). Qualcomm admits that the first page of Exhibit 3 lists the title, issue date, and inventors as identified in Paragraph 80 of the Complaint. Qualcomm denies that the ’052 patent should have been issued. Qualcomm is without knowledge or information sufficient to admit or deny the remaining allegations of Paragraph 80 and therefore denies the same.

81. Qualcomm admits that the ’052 patent has three independent claims and four dependent claims. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 81.

82. Paragraph 82 alleges legal conclusions to which no response is required. To the extent a response is required, Qualcomm denies the allegations and characterizations in Paragraph 82 of the Complaint.

83. Qualcomm admits that Paragraph 83 reproduces the language of claim 6 of the '052 patent. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 83 of the Complaint.

84. Qualcomm denies the allegations and characterizations contained in Paragraph 84 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 84 of the Complaint, and therefore denies the same.

85. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in the first sentence of Paragraph 85 of the Complaint, and therefore denies them. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 85 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 85 of the Complaint, and therefore denies the same.

86. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 86 of the Complaint, and therefore denies them.

87. Qualcomm admits that, based on a current review of publicly-available information, it appears that U.S. Publication No. 2007/0186018 was cited, along with a number of references, during prosecution of at least one patent application that was assigned to Defendant Arteris or an affiliate of Arteris, but U.S. Publication No. 2007/0186018 was not the basis for any rejection during prosecution of the Arteris application. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the remaining

allegations and characterizations contained in Paragraph 87 of the Complaint, and therefore denies them.

88. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) U.S. Publication No. 2007/0186018 was cited, along with a number of other references, on October 4, 2022 during the prosecution of U.S. Patent Application No. 17/665,578, entitled “SYSTEM AND METHOD FOR SYNTHESIS OF CONNECTIVITY TO AN INTERCONNECT IN A MULTI-PROTOCOL SYSTEM-ON-CHIP (SoC)”; (2) U.S. Patent Application No. 17/665,578 lists a filing date of February 6, 2022; and (3) U.S. Patent Application No. 17/665,578 was assigned to Defendant Arteris or an affiliate of Arteris. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and characterizations contained in Paragraph 88 of the Complaint, and therefore denies them.

89. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 89 of the Complaint, and therefore denies them.

90. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 90 of the Complaint, and therefore denies them.

91. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 91 of the Complaint, and therefore denies them.

92. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 92 of the Complaint, and therefore denies them.

93. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 93 of the Complaint, and therefore denies them.

94. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 94 of the Complaint, and therefore denies them.

95. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 95 of the Complaint, and therefore denies them.

96. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 96 of the Complaint, and therefore denies them.

97. Qualcomm restates, re-alleges, and incorporates by reference as though fully set forth herein its answer to Paragraph 45, as Paragraph 97 is duplicative of Paragraph 45.

98. Qualcomm denies the allegations and characterizations contained in Paragraph 98 of the Complaint.

99. Qualcomm denies the allegations and characterizations contained in Paragraph 99 of the Complaint.

100. Qualcomm admits that some of its employees have expertise and technical competence relative to SoC interconnects and NoCs. Qualcomm is currently without knowledge

or information sufficient to form a belief as to the truth of any remaining allegations and characterizations contained in Paragraph 100 of the Complaint and therefore denies them.

101. Qualcomm denies the allegations and characterizations contained in Paragraph 101 of the Complaint.

**U.S. Patent No. 7,769,893**

102. Qualcomm acknowledges that Exhibit 4 to the Complaint purports to be a copy of U.S. Patent No. 7,769,893 (the “’9893 patent”). Qualcomm admits that the first page of Exhibit 4 lists the title, issue date, and inventor as identified in Paragraph 102 of the Complaint. Qualcomm denies that the ’9893 patent should have been issued. Qualcomm is without knowledge or information sufficient to admit or deny the remaining allegations of Paragraph 102 and therefore denies the same.

103. Qualcomm admits that the ’9893 patent has two independent claims and nine dependent claims. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 103.

104. Paragraph 104 alleges legal conclusions to which no response is required. To the extent a response is required, Qualcomm denies the allegations and characterizations in Paragraph 104 of the Complaint.

105. Qualcomm admits Paragraph 105 reproduces the language of claim 4 of the ’9893 patent. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 105 of the Complaint.

106. Qualcomm denies the allegations and characterizations contained in Paragraph 106 of the Complaint. Qualcomm is currently without knowledge or information sufficient to

form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 106 of the Complaint, and therefore denies the same.

107. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in the first sentence of Paragraph 107 of the Complaint, and therefore denies them. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 107 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 107 of the Complaint, and therefore denies the same.

108. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 108 of the Complaint, and therefore denies them.

109. Qualcomm admits that, based on a current review of publicly-available information, it appears that the U.S. Publication No. 2006/0095920 was cited, along with a number of other references, during prosecution of at least one U.S. patent application that was assigned to Defendant Arteris or an affiliate of Arteris, but U.S. Publication No. 2006/0095920 was not the basis for any rejection during prosecution of the Arteris applications and one of the Arteris applications was abandoned in 2010. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and characterizations contained in Paragraph 109 of the Complaint, and therefore denies them.

110. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) FR2900017B1 is entitled “EXTERNAL CHIP FUNCTIONAL BLOCK INTERCONNECTION SYSTEM PROVIDED WITH A SINGLE



COMMUNICATION PARAMETRABLE PROTOCOL”; (2) FR2900017B1 lists an issue date of October 31, 2008; (3) FR2900017B1 was assigned to Defendant Arteris or an affiliate of Arteris. Because Qualcomm was not involved with the prosecution of FR2900017B1, Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and characterizations contained in Paragraph 110 of the Complaint, and therefore denies them.

111. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) FR2904445B1 is entitled “SYSTEM FOR MANAGING MESSAGES TRANSMITTED IN A CHIP INTERCONNECTION NETWORK”; (2) FR2904445B1 lists an issue date of October 10, 2008; (3) FR2904445B1 was assigned to Defendant Arteris or an affiliate of Arteris. Because Qualcomm was not involved with the prosecution of FR2904445B1, Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and characterizations contained in Paragraph 111 of the Complaint, and therefore denies them.

112. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) U.S. Publication No. 2006/0095920 was cited, along with a number of other references, during the prosecution of U.S. Patent Application No. 11/518,384, entitled “SYSTEM FOR MANAGING MESSAGES TRANSMITTED IN AN ON-CHIP INTERCONNECT NETWORK”; (2) U.S. Patent Application No. 11/518,384 lists a filing date of September 8, 2006; (3) U.S. Patent Application No. 11/518,384 was assigned to Defendant Arteris or an affiliate of Arteris; and (4) the Examiner during the prosecution of U.S. Patent Application No. 11/518,384 stated that “The prior art made of record and not relied upon is considered pertinent to applicant’s disclosure because they relate network on a chip

architecture.” Office Action dated Nov. 23, 2009, File History of U.S. Pat. App. No. 11/518,384. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 112 of the Complaint.

113. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) the U.S. Publication No. 2006/0095920, was cited, along with a number of other references, during the prosecution of U.S. Patent No. 9,471,538, entitled “NETWORK ON A CHIP SOCKET PROTOCOL”; (2) U.S. Patent No. 9,471,538 lists a filing date of September 25, 2012 and an issue date of October 18, 2016; and (3) U.S. Patent No. 9,471,538 was assigned to Arteris SAS. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 113 of the Complaint.

114. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 114 of the Complaint, and therefore denies them.

115. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 115 of the Complaint, and therefore denies them.

116. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 116 of the Complaint, and therefore denies them.

117. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 117 of the Complaint, and therefore denies them.

118. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 118 of the Complaint, and therefore denies them.

119. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 119 of the Complaint, and therefore denies them.

120. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 120 of the Complaint, and therefore denies them.

121. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 121 of the Complaint, and therefore denies them.

122. Qualcomm admits that, based on a current review of publicly-available information, it appears that the '9893 patent, or the application therefor, was cited, along with a number of other references, during the prosecution of at least one patent application that was assigned to Qualcomm. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 122 of the Complaint.

123. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) the '9893 patent was cited, along with a number of other references, during the prosecution of U.S. Patent No. 8,861,410, entitled "METHOD AND APPARATUS FOR SCALABLE NETWORK TRANSACTION IDENTIFIER FOR INTERCONNECTS"; (2) U.S. Patent No. 8,861,410 lists a filing date of October 31, 2011 and an issue date of October 14, 2014; and (3) U.S. Patent No. 8,861,410 is assigned to Qualcomm

Incorporated. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 123 of the Complaint.

124. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) the '9893 patent was cited, along with a number of other references, during the prosecution of U.S. Patent No. 8,838,861, entitled "METHODS AND APPARATUSES FOR TRACE MULTICAST ACROSS A BUS STRUCTURE, AND RELATED SYSTEMS"; (2) U.S. Patent No. 8,838,861 lists a filing date of June 25, 2012 and an issue date of September 16, 2014; and (3) U.S. Patent No. 8,838,861 is assigned to Qualcomm Incorporated. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 124 of the Complaint.

125. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) the U.S. Publication No. 2006/0095920 was cited, along with a number of other references, during the prosecution of U.S. Patent No. 9,471,538, entitled "NETWORK ON A CHIP SOCKET PROTOCOL"; (2) U.S. Patent No. 9,471,538 lists a filing date of September 25, 2012 and an issue date of October 18, 2016; and (3) U.S. Patent No. 9,471,538 was later assigned to Qualcomm Technologies, Inc. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 125 of the Complaint.

126. Qualcomm admits that, based on a current review of publicly-available information, it appears that (1) U.S. Publication No. 2006/0095920 was cited, along with a number of other references, during the prosecution of U.S. Patent Application No. 11/518,384, entitled "SYSTEM FOR MANAGING MESSAGES TRANSMITTED IN AN ON-CHIP INTERCONNECT NETWORK"; (2) U.S. Patent Application No. 11/518,384 lists a filing date of September 8, 2006; (3) U.S. Patent Application No. 11/518,384 was later assigned to

Qualcomm in 2013, more than three years after the application was abandoned; and (4) the Examiner during the prosecution of U.S. Patent Application No. 11/518,384 stated that “The prior art made of record and not relied upon is considered pertinent to applicant’s disclosure because they relate network on a chip architecture.” Office Action dated Nov. 23, 2009, File History of U.S. Pat. App. No. 11/518,384. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 126 of the Complaint.

127. Qualcomm admits that it has sought to obtain valid and enforceable patents. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 127 of the Complaint.

128. Qualcomm denies the allegations and characterizations contained in Paragraph 128 of the Complaint.

129. Qualcomm restates, re-alleges, and incorporates by reference as though fully set forth herein its answer to Paragraph 45, as Paragraph 129 is duplicative of Paragraph 45.

130. Qualcomm denies the allegations and characterizations contained in Paragraph 130 of the Complaint.

131. Qualcomm denies the allegations and characterizations contained in Paragraph 131 of the Complaint.

132. Qualcomm admits that some of its employees have expertise and technical competence relative to SoC interconnects and NoCs. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of any remaining allegations and characterizations contained in Paragraph 132 of the Complaint and therefore denies them.

133. Qualcomm denies the allegations and characterizations contained in Paragraph 133 of the Complaint.

**U.S. Patent No. 8,072,893**

134. Qualcomm acknowledges that Exhibit 5 to the Complaint purports to be a copy of U.S. Patent No. 8,072,893 (the “’2893 patent”). Qualcomm admits that the first page of Exhibit 5 lists the title, issue date, and inventors as identified in Paragraph 134 of the Complaint. Qualcomm denies that the ’2893 patent should have been issued. Qualcomm is without knowledge or information sufficient to admit or deny the remaining allegations of Paragraph 134 and therefore denies the same.

135. Qualcomm admits that the ’2893 patent has five independent claims and seven dependent claims. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 135.

136. Qualcomm admits that Paragraph 136 reproduces the language of claim 10 of the ’2893 patent. The remaining allegations and characterizations contained in Paragraph 136 allege legal conclusions to which no response is required. To the extent a response is required, Qualcomm denies the remaining allegations and characterizations in Paragraph 136 of the Complaint.

137. Qualcomm denies the allegations and characterizations contained in Paragraph 137 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 137 of the Complaint, and therefore denies the same.

138. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in the first sentence of Paragraph 138 of the Complaint, and therefore denies them. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 138 of the Complaint. Qualcomm is

currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 138 of the Complaint, and therefore denies the same.

139. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 139 of the Complaint, and therefore denies them.

140. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 140 of the Complaint, and therefore denies them.

141. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 141 of the Complaint, and therefore denies them.

142. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 142 of the Complaint, and therefore denies them.

143. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 143 of the Complaint, and therefore denies them.

144. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 144 of the Complaint, and therefore denies them.

145. Qualcomm restates, re-alleges, and incorporates by reference as though fully set forth herein its answer to Paragraph 45, as Paragraph 145 is duplicative of Paragraph 45.

146. Qualcomm denies the allegations and characterizations contained in Paragraph 146 of the Complaint.

147. Qualcomm denies the allegations and characterizations contained in Paragraph 147 of the Complaint.

148. Qualcomm admits that some of its employees have expertise and technical competence relative to SoC interconnects and NoCs. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of any remaining allegations and characterizations contained in Paragraph 148 of the Complaint and therefore denies them.

149. Qualcomm denies the allegations and characterizations contained in Paragraph 149 of the Complaint.

**U.S. Patent No. 8,086,800**

150. Qualcomm acknowledges that Exhibit 6 to the Complaint purports to be a copy of U.S. Patent No. 8,086,800 (the “’800 patent”). Qualcomm admits that the first page of Exhibit 6 lists the title, issue date, and inventors as identified in Paragraph 150 of the Complaint. Qualcomm denies that the ’800 patent should have been issued. Qualcomm is without knowledge or information sufficient to admit or deny the remaining allegations of Paragraph 150 and therefore denies the same.

151. Qualcomm admits that the ’800 patent has four independent claims and seventeen dependent claims. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 151.

152. Paragraph 152 alleges legal conclusions to which no response is required. To the extent a response is required, Qualcomm denies the allegations and characterizations in Paragraph 152 of the Complaint.



153. Qualcomm admits that Paragraph 153 reproduces the language of claim 10 of the '800 patent. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 153 of the Complaint.

154. Qualcomm denies the allegations and characterizations contained in Paragraph 154 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 154 of the Complaint, and therefore denies the same.

155. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in the first sentence of Paragraph 155 of the Complaint, and therefore denies them. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 155 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 155 of the Complaint, and therefore denies the same.

156. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 156 of the Complaint, and therefore denies them.

157. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 157 of the Complaint, and therefore denies them.

158. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 158 of the Complaint, and therefore denies them.

159. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 159 of the Complaint, and therefore denies them.

160. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 160 of the Complaint, and therefore denies them.

161. Qualcomm restates, re-alleges, and incorporates by reference as though fully set forth herein its answer to Paragraph 45, as Paragraph 161 is duplicative of Paragraph 45.

162. Qualcomm denies the allegations and characterizations contained in Paragraph 162 of the Complaint.

163. Qualcomm denies the allegations and characterizations contained in Paragraph 163 of the Complaint.

164. Qualcomm admits that some of its employees have expertise and technical competence relative to SoC interconnects and NoCs. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of any remaining allegations and characterizations contained in Paragraph 164 of the Complaint and therefore denies them.

165. Qualcomm denies the allegations and characterizations contained in Paragraph 165 of the Complaint.

**ALLEGATIONS OF DEFENDANTS' INFRINGING CONDUCT**

166. Qualcomm restates, re-alleges, and incorporates by reference each of its answers to Paragraphs 1 through 165 of the Complaint as though fully set forth herein.

167. Qualcomm admits that SoCs are used in consumer electronics or computing devices, including smartphones, laptops, tablets, and embedded systems such as vehicle

infotainment devices and advanced driver assistance systems. Qualcomm further admits that SoCs are integrated circuits that can include multiple processors, memory units, and interfaces. Qualcomm denies any remaining allegations and characterizations in Paragraph 167 of the Complaint.

168. Qualcomm denies the allegations and characterizations contained in Paragraph 168 of the Complaint.

169. Qualcomm denies the allegations and characterizations contained in Paragraph 169 of the Complaint.

170. Qualcomm admits that it is a leading semiconductor company. As Paragraph 170 is vague and ambiguous (including without limitation the word “provides,” the phrase “Arteris interconnect technology, and/or a derivative thereof,” and the recitation of various activities in the alternative and without geographic scope), Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and characterizations contained in Paragraph 170 of the Complaint, and therefore denies the same.

171. Qualcomm denies the allegations and characterizations contained in Paragraph 171 of the Complaint. Qualcomm further denies that its products infringe or have infringed the Asserted Patents.

172. Qualcomm denies the allegations and characterizations contained in Paragraph 172 of the Complaint. Qualcomm further denies that its products infringe or have infringed the Asserted Patents.

173. Qualcomm denies the allegations and characterizations contained in Paragraph 173 of the Complaint. Qualcomm further denies that Qualcomm and its products infringe or have infringed the Asserted Patents.

174. To the extent a response is required, Qualcomm denies the allegations and characterizations in Paragraph 174 of the Complaint. Qualcomm admits that Exhibits 7-12 purport to set forth Plaintiff's allegations of infringement but denies that Exhibits 7-12 support Plaintiff's infringement allegations. Qualcomm further denies that its products infringe or have infringed the Asserted Patents.

175. Qualcomm denies the allegations and characterizations contained in Paragraph 175 of the Complaint. Qualcomm further denies that Qualcomm has induced infringement or that it continues to induce infringement of the Asserted Patents.

176. Qualcomm admits that certain products are listed on its website. Qualcomm further admits that there are product related documents for certain Qualcomm products. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 176 of the Complaint.

177. Qualcomm denies the allegations and characterizations contained in Paragraph 177 of the Complaint. Qualcomm further denies that Qualcomm has contributorily infringed or that it continues to contributorily infringe the Asserted Patents.

178. Qualcomm denies the allegations and characterizations contained in Paragraph 178 of the Complaint.

179. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 179 of the Complaint, and therefore denies them.

180. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 180 of the Complaint, and therefore denies them.

181. To the extent a response is required, Qualcomm denies the allegations and characterizations in Paragraph 181 of the Complaint. Qualcomm further denies that its products infringe or have infringed the Asserted Patents.

182. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 182 of the Complaint concerning Defendant Arteris relative to other entities, and therefore denies the same. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 182 of the Complaint.

183. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 183 of the Complaint concerning Defendant Arteris relative to other entities, and therefore denies the same. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 183 of the Complaint.

184. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 184 of the Complaint concerning Defendant Arteris relative to other entities, and therefore denies the same. Qualcomm denies the remaining allegations and characterizations contained in Paragraph 184 of the Complaint.

185. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 185 of the Complaint, and therefore denies them.

186. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 186 of the Complaint, and therefore denies them.

187. Qualcomm denies the allegations and characterizations contained in Paragraph 187 of the Complaint. Qualcomm further denies that its products infringe or have infringed the Asserted Patents.

**COUNT I – ALLEGED INFRINGEMENT OF U.S. PATENT NO. 7,366,818**

188. Qualcomm restates, re-alleges, and incorporates by reference each of its answers to Paragraphs 1 through 187 of the Complaint as though fully set forth herein.

189. Qualcomm denies the allegations and characterizations contained in Paragraph 189 of the Complaint. Qualcomm admits that Exhibit 7 purports to set forth Plaintiff's allegations of infringement but denies that Exhibit 7 supports Plaintiff's infringement allegations. Qualcomm further denies that its products infringe or have infringed the '818 patent.

190. Qualcomm denies the allegations and characterizations contained in Paragraph 190 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '818 patent.

191. Qualcomm denies the allegations and characterizations contained in Paragraph 191 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '818 patent.

192. Qualcomm denies the allegations and characterizations contained in Paragraph 192 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '818 patent.

193. Qualcomm denies the allegations and characterizations contained in Paragraph 193 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '818 patent.

194. Qualcomm denies the allegations and characterizations contained in Paragraph 194 of the Complaint. Qualcomm further denies that Qualcomm infringes or has infringed the '818 patent.

195. Qualcomm denies the allegations and characterizations contained in Paragraph 195 of the Complaint.

196. Qualcomm denies the allegations and characterizations contained in Paragraph 196 of the Complaint.

197. Qualcomm denies the allegations and characterizations contained in Paragraph 197 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 197 of the Complaint, and therefore denies the same. Qualcomm admits that Exhibit 7 purports to set forth Plaintiff's allegations of infringement but denies that Exhibit 7 supports Plaintiff's infringement allegations. Qualcomm further denies that its products infringe or have infringed the '818 patent.

198. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 198 of the Complaint, and therefore denies them. Qualcomm further denies that its products infringe or have infringed the '818 patent.

199. Qualcomm denies the allegations and characterizations contained in Paragraph 199 of the Complaint. Qualcomm is currently without knowledge or information sufficient to

form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 199 of the Complaint, and therefore denies the same. Qualcomm further denies that its products infringe or have infringed the '818 patent.

200. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 200 of the Complaint, and therefore denies them. Qualcomm further denies that its products infringe or have infringed the '818 patent.

201. Qualcomm denies the allegations and characterizations contained in Paragraph 201 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 201 of the Complaint, and therefore denies the same. Qualcomm further denies that its products infringe or have infringed the '818 patent.

202. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 202 of the Complaint, and therefore denies them.

203. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 203 of the Complaint, and therefore denies them.

204. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 204 of the Complaint, and therefore denies them.

**COUNT II – ALLEGED INFRINGEMENT OF U.S. PATENT NO. 7,373,449**



205. Qualcomm restates, re-alleges, and incorporates by reference each of its answers to Paragraphs 1 through 204 of the Complaint as though fully set forth herein.

206. Qualcomm denies the allegations and characterizations contained in Paragraph 206 of the Complaint. Qualcomm admits that Exhibit 8 purports to set forth Plaintiff's allegations of infringement but denies that Exhibit 8 supports Plaintiff's infringement allegations. Qualcomm further denies that its products infringe or have infringed the '449 patent.

207. Qualcomm denies the allegations and characterizations contained in Paragraph 207 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '449 patent.

208. Qualcomm denies the allegations and characterizations contained in Paragraph 208 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '449 patent.

209. Qualcomm denies the allegations and characterizations contained in Paragraph 209 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '449 patent.

210. Qualcomm denies the allegations and characterizations contained in Paragraph 210 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '449 patent.

211. Qualcomm denies the allegations and characterizations contained in Paragraph 211 of the Complaint. Qualcomm further denies that Qualcomm infringes or has infringed the '449 patent.

212. Qualcomm denies the allegations and characterizations contained in Paragraph 212 of the Complaint.

213. Qualcomm denies the allegations and characterizations contained in Paragraph 213 of the Complaint.

214. Qualcomm denies the allegations and characterizations contained in Paragraph 214 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 214 of the Complaint, and therefore denies the same. Qualcomm admits that Exhibit 8 purports to set forth Plaintiff's allegations of infringement but denies that Exhibit 8 supports Plaintiff's infringement allegations. Qualcomm further denies that its products infringe or have infringed the '449 patent.

215. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 215 of the Complaint, and therefore denies them. Qualcomm further denies that its products infringe or have infringed the '449 patent.

216. Qualcomm denies the allegations and characterizations contained in Paragraph 216 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 216 of the Complaint, and therefore denies the same. Qualcomm further denies that its products infringe or have infringed the '449 patent.

217. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 217 of the Complaint, and therefore denies them. Qualcomm further denies that its products infringe or have infringed the '449 patent.

218. Qualcomm denies the allegations and characterizations contained in Paragraph 218 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 218 of the Complaint, and therefore denies the same. Qualcomm further denies that its products infringe or have infringed the '449 patent.

219. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 219 of the Complaint, and therefore denies them.

220. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 220 of the Complaint, and therefore denies them.

221. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 221 of the Complaint, and therefore denies them.

**COUNT III – ALLEGED INFRINGEMENT OF U.S. PATENT NO. 7,594,052**

222. Qualcomm restates, re-alleges, and incorporates by reference each of its answers to Paragraphs 1 through 221 of the Complaint as though fully set forth herein.

223. Qualcomm denies the allegations and characterizations contained in Paragraph 223 of the Complaint. Qualcomm admits that Exhibit 9 purports to set forth Plaintiff's allegations of infringement but denies that Exhibit 9 supports Plaintiff's infringement allegations. Qualcomm further denies that its products infringe or have infringed the '052 patent.

224. Qualcomm denies the allegations and characterizations contained in Paragraph 224 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '052 patent.

225. Qualcomm denies the allegations and characterizations contained in Paragraph 225 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '052 patent.

226. Qualcomm denies the allegations and characterizations contained in Paragraph 226 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '052 patent.

227. Qualcomm denies the allegations and characterizations contained in Paragraph 227 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '052 patent.

228. Qualcomm denies the allegations and characterizations contained in Paragraph 228 of the Complaint. Qualcomm further denies that Qualcomm infringes or has infringed the '052 patent.

229. Qualcomm denies the allegations and characterizations contained in Paragraph 229 of the Complaint.

230. Qualcomm denies the allegations and characterizations contained in Paragraph 230 of the Complaint.

231. Qualcomm denies the allegations and characterizations contained in Paragraph 231 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 231 of the Complaint, and therefore denies the same. Qualcomm admits

that Exhibit 9 purports to set forth Plaintiff's allegations of infringement but denies that Exhibit 9 supports Plaintiff's infringement allegations. Qualcomm further denies that its products infringe or have infringed the '052 patent.

232. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 232 of the Complaint, and therefore denies them. Qualcomm further denies that its products infringe or have infringed the '052 patent.

233. Qualcomm denies the allegations and characterizations contained in Paragraph 233 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 233 of the Complaint, and therefore denies the same. Qualcomm further denies that its products infringe or have infringed the '052 patent.

234. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 234 of the Complaint, and therefore denies them. Qualcomm further denies that its products infringe or have infringed the '052 patent.

235. Qualcomm denies the allegations and characterizations contained in Paragraph 235 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 235 of the Complaint, and therefore denies the same. Qualcomm further denies that its products infringe or have infringed the '052 patent.

236. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 236 of the Complaint, and therefore denies them.

237. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 237 of the Complaint, and therefore denies them.

238. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 238 of the Complaint, and therefore denies them.

**COUNT IV – ALLEGED INFRINGEMENT OF U.S. PATENT NO. 7,769,893**

239. Qualcomm restates, re-alleges, and incorporates by reference each of its answers to Paragraphs 1 through 238 of the Complaint as though fully set forth herein.

240. Qualcomm denies the allegations and characterizations contained in Paragraph 240 of the Complaint. Qualcomm admits that Exhibit 10 purports to set forth Plaintiff's allegations of infringement but denies that Exhibit 10 supports Plaintiff's infringement allegations. Qualcomm further denies that its products infringe or have infringed the '9893 patent.

241. Qualcomm denies the allegations and characterizations contained in Paragraph 241 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '9893 patent.

242. Qualcomm denies the allegations and characterizations contained in Paragraph 242 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '9893 patent.

243. Qualcomm denies the allegations and characterizations contained in Paragraph 243 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '9893 patent.

244. Qualcomm denies the allegations and characterizations contained in Paragraph 244 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '9893 patent.

245. Qualcomm denies the allegations and characterizations contained in Paragraph 245 of the Complaint. Qualcomm further denies that Qualcomm infringes or has infringed the '9893 patent.

246. Qualcomm denies the allegations and characterizations contained in Paragraph 246 of the Complaint.

247. Qualcomm denies the allegations and characterizations contained in Paragraph 247 of the Complaint.

248. Qualcomm denies the allegations and characterizations contained in Paragraph 248 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 248 of the Complaint, and therefore denies the same. Qualcomm admits that Exhibit 10 purports to set forth Plaintiff's allegations of infringement but denies that Exhibit 10 supports Plaintiff's infringement allegations. Qualcomm further denies that its products infringe or have infringed the '9893 patent.

249. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 249 of the

Complaint, and therefore denies them. Qualcomm further denies that its products infringe or have infringed the '9893 patent.

250. Qualcomm denies the allegations and characterizations contained in Paragraph 250 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 250 of the Complaint, and therefore denies the same. Qualcomm further denies that its products infringe or have infringed the '9893 patent.

251. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 251 of the Complaint, and therefore denies them. Qualcomm further denies that its products infringe or have infringed the '9893 patent.

252. Qualcomm denies the allegations and characterizations contained in Paragraph 252 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 252 of the Complaint, and therefore denies the same, Qualcomm further denies that its products infringe or have infringed the '9893 patent.

253. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 253 of the Complaint, and therefore denies them.

254. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 254 of the Complaint, and therefore denies them.



255. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 255 of the Complaint, and therefore denies them.

**COUNT V – ALLEGED INFRINGEMENT OF U.S. PATENT NO. 8,072,893**

256. Qualcomm restates, re-alleges, and incorporates by reference each of its answers to Paragraphs 1 through 255 of the Complaint as though fully set forth herein.

257. Qualcomm denies the allegations and characterizations contained in Paragraph 257 of the Complaint. Qualcomm admits that Exhibit 11 purports to set forth Plaintiff's allegations of infringement but denies that Exhibit 11 supports Plaintiff's infringement allegations. Qualcomm further denies that its products infringe or have infringed the '2893 patent.

258. Qualcomm denies the allegations and characterizations contained in Paragraph 258 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '2893 patent.

259. Qualcomm denies the allegations and characterizations contained in Paragraph 259 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '2893 patent.

260. Qualcomm denies the allegations and characterizations contained in Paragraph 260 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '2893 patent.

261. Qualcomm denies the allegations and characterizations contained in Paragraph 261 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '2893 patent.

262. Qualcomm denies the allegations and characterizations contained in Paragraph 262 of the Complaint. Qualcomm further denies that Qualcomm infringes or has infringed the '2893 patent.

263. Qualcomm denies the allegations and characterizations contained in Paragraph 263 of the Complaint.

264. Qualcomm denies the allegations and characterizations contained in Paragraph 264 of the Complaint.

265. Qualcomm denies the allegations and characterizations contained in Paragraph 265 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 265 of the Complaint, and therefore denies the same. Qualcomm admits that Exhibit 11 purports to set forth Plaintiff's allegations of infringement but denies that Exhibit 11 supports Plaintiff's infringement allegations. Qualcomm further denies that its products infringe or have infringed the '2893 patent.

266. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 266 of the Complaint, and therefore denies them. Qualcomm further denies that its products infringe or have infringed the '2893 patent.

267. Qualcomm denies the allegations and characterizations contained in Paragraph 267 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 267 of the Complaint, and therefore denies the same. Qualcomm further denies that its products infringe or have infringed the '2893 patent.

268. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 268 of the Complaint, and therefore denies them. Qualcomm further denies that its products infringe or have infringed the '2893 patent.

269. Qualcomm denies the allegations and characterizations contained in Paragraph 269 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 269 of the Complaint, and therefore denies the same. Qualcomm further denies that its products infringe or have infringed the '2893 patent.

270. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 270 of the Complaint, and therefore denies them.

271. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 271 of the Complaint, and therefore denies them.

272. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 272 of the Complaint, and therefore denies them.

**COUNT VI – ALLEGED INFRINGEMENT OF U.S. PATENT NO. 8,086,800**

273. Qualcomm restates, re-alleges, and incorporates by reference each of its answers to Paragraphs 1 through 272 of the Complaint as though fully set forth herein.

274. Qualcomm denies the allegations and characterizations contained in Paragraph 274 of the Complaint. Qualcomm admits that Exhibit 12 purports to set forth Plaintiff's

allegations of infringement but denies that Exhibit 12 supports Plaintiff's infringement allegations. Qualcomm further denies that its products infringe or have infringed the '800 patent.

275. Qualcomm denies the allegations and characterizations contained in Paragraph 275 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '800 patent.

276. Qualcomm denies the allegations and characterizations contained in Paragraph 276 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '800 patent.

277. Qualcomm denies the allegations and characterizations contained in Paragraph 277 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '800 patent.

278. Qualcomm denies the allegations and characterizations contained in Paragraph 278 of the Complaint. Qualcomm further denies that its products infringe or have infringed the '800 patent.

279. Qualcomm denies the allegations and characterizations contained in Paragraph 279 of the Complaint. Qualcomm further denies that Qualcomm infringes or has infringed the '800 patent.

280. Qualcomm denies the allegations and characterizations contained in Paragraph 280 of the Complaint.

281. Qualcomm denies the allegations and characterizations contained in Paragraph 281 of the Complaint.

282. Qualcomm denies the allegations and characterizations contained in Paragraph 282 of the Complaint. Qualcomm is currently without knowledge or information sufficient to

form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 282 of the Complaint, and therefore denies the same. Qualcomm admits that Exhibit 12 purports to set forth Plaintiff's allegations of infringement but denies that Exhibit 12 supports Plaintiff's infringement allegations. Qualcomm further denies that its products infringe or have infringed the '800 patent.

283. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 283 of the Complaint, and therefore denies them. Qualcomm further denies that its products infringe or have infringed the '800 patent.

284. Qualcomm denies the allegations and characterizations contained in Paragraph 284 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 284 of the Complaint, and therefore denies the same. Qualcomm further denies that its products infringe or have infringed the '800 patent.

285. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 285 of the Complaint, and therefore denies them. Qualcomm further denies that its products infringe or have infringed the '800 patent.

286. Qualcomm denies the allegations and characterizations contained in Paragraph 286 of the Complaint. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations concerning Defendant Arteris contained in Paragraph 286 of the Complaint, and therefore denies the same. Qualcomm further denies that its products infringe or have infringed the '800 patent.

287. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 287 of the Complaint, and therefore denies them.

288. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 288 of the Complaint, and therefore denies them.

289. Qualcomm is currently without knowledge or information sufficient to form a belief as to the truth of the allegations and characterizations contained in Paragraph 289 of the Complaint, and therefore denies them.

### **RESPONSE TO PRAYER FOR RELIEF**

The remaining allegations are part of a prayer for relief that do not require admissions or denials by Qualcomm. Qualcomm denies that Plaintiff is entitled to the relief sought against Defendants in its Prayer for Relief and accompanying Paragraphs (A)–(H) of the Complaint or any relief at all for the allegations relating to Defendants made in the Complaint. Based on its denials of the allegations in the Complaint, Qualcomm prays that the Court dismiss the Complaint in its entirety with prejudice, that Plaintiff not be awarded any of the relief, recovery or damages sought in its Prayer for Relief, and that the Court deem this case exceptional and award Defendants all costs and fees in this action, including without limitation Defendants’ attorneys’ fees and expenses.

### **JURY DEMAND**

Plaintiff’s Jury Demand is a demand, not an allegation, and does not require admission or denial. Qualcomm demands a jury trial for all issues triable to a jury.

### **GENERAL DENIAL**

To the extent any allegations in the Complaint are not specifically admitted, Qualcomm denies them.

**AFFIRMATIVE AND ADDITIONAL DEFENSES**

Qualcomm asserts the following affirmative and additional defenses without assuming any burden that it would not otherwise have, including without admitting or acknowledging that it bears the burden of proof as to any of them.

**FIRST DEFENSE**  
**(Failure to State a Claim)**

Plaintiff's Complaint fails to state any claim against Qualcomm upon which relief may be granted.

**SECOND DEFENSE**  
**(Invalidity)**

The claims of the Asserted Patents are invalid for failure to satisfy one or more of the conditions for patentability specified in Title 35 of the United States Code, without limitation to those specified in 35 U.S.C. §§ 101, 102, 103, 112, and/or judicially created doctrines such as double patenting, because one or more of the claims are invalid inasmuch as they are unpatentable; and/or because they are taught by, suggested by, anticipated by, and/or obvious in view of the prior art; and/or because one or more of the claims lack definiteness, are not enabled, and/or are unsupported by the written description of the invention.

**THIRD DEFENSE**  
**(Non-infringement)**

Qualcomm has not infringed, and does not infringe (literally, under the doctrine of equivalents, directly, indirectly, contributorily, by inducement, willfully or otherwise) any valid, enforceable claim of any of the Asserted Patents.

**FOURTH DEFENSE**  
**(Damages, Costs, and 35 U.S.C. §§ 286, 287, and/or 288)**



The relief requested in the Complaint is barred due to the failure by Plaintiff to satisfy all of the conditions precedent to bringing this action. Plaintiff is not entitled to damages, costs, fees, or any other kind of relief because there has been no infringement of the Asserted Patents, the Asserted Patents are invalid, Plaintiff has suffered no harm, and the balance of equities weighs against granting Plaintiff any relief. Plaintiff's claims for relief are also barred or, at least, limited by 35 U.S.C. §§ 286, 287, and/or 288. Plaintiff's claims for damages and/or costs are barred or limited, in whole or in part, pursuant to 35 U.S.C. § 286, which prohibits recovery for activities committed more than six years before the filing of the Complaint. Moreover, to the extent that Plaintiff and any predecessors in interest, or any licensees to the Asserted Patents failed to properly mark any of their relevant products or materials as required by 35 U.S.C. § 287, or otherwise give proper notice that Qualcomm's actions allegedly infringe the Asserted Patents, Qualcomm is not liable to Plaintiff for the acts alleged to have been performed before Qualcomm received actual notice that it was allegedly infringing the Asserted Patents.

**FIFTH DEFENSE**  
**(Injunctive Relief is Inappropriate)**

Plaintiff is not entitled to injunctive relief as a matter of law or equity. Plaintiff is not entitled to injunctive relief at least because Qualcomm does not infringe the Asserted Patents, the Asserted Patents are invalid, Plaintiff has suffered no harm, and the balance of the equities weighs against granting Plaintiff any relief. Further, Plaintiff is not entitled to injunctive relief at least because it has not and will not suffer irreparable harm, it has made no allegations that it practices any of the Asserted Patents, it is not without an adequate remedy at law, and the balance of equities favors no injunction.

**SIXTH DEFENSE**  
**(Estoppel, Waiver, Acquiescence, Implied License)**

Plaintiff's claims for relief are barred by the doctrines of estoppel (including, without limitation, prosecution history estoppel), waiver, acquiescence, and/or implied license.

**SEVENTH DEFENSE**  
**(Not an Exceptional Case)**

Qualcomm's actions in defending this case do not give rise to an exceptional case under 35 U.S.C. § 285.

**EIGHTH DEFENSE**  
**(Willful Infringement is Inappropriate)**

Qualcomm has not willfully infringed any claim of the Asserted Patents.

**RESERVATION OF RIGHTS**

Qualcomm expressly reserves the right to later assert and pursue further defenses and counterclaims in this action, the basis of which may be discovered during the course of discovery.

Respectfully submitted,

Dated: February 27, 2023

s/ J. Derek Vandenburg

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Qualcomm Incorporated and  
Qualcomm Technologies, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on February 27, 2023, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system. Any other counsel of record will be served by electronic mail on this same date.

s/ J. Derek Vandenburg